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7 *Pro-Bono Counsel for Plaintiff*

8
 9 **UNITED STATES DISTRICT COURT**
 10
 11 **DISTRICT OF NEVADA**

12 ANTHONY GALBRAITH,
 12 Plaintiff,
 13
 13 v.
 14 DR. MICHAEL MINEV, et al.,
 15 Defendants.

16 Case No.: 2:21-cv-0932-RFB-DJA

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 18 **STIPULATION AND PROPOSED
 19 ORDER TO EXTEND PRETRIAL
 20 DEADLINES**
 21 (SECOND REQUEST)

22 Plaintiff Anthony Galbraith (“Galbraith” or “Plaintiff”) and Defendants Dr. Michael Minev,
 23 Gregory Bryan, Brittany Caldwell, and Dawn Jones (“Defendants”), by and through their
 24 undersigned counsel of record, respectfully submit this Stipulation and Proposed Order to Extend
 25 Discovery in this case by sixty (60) days under Local Rules IA 6-1 and 26-3. This is the second
 26 request that the Court extend the completion of discovery and related deadlines.

27
 28 **COMPLETED DISCOVERY**

29 The Parties submitted their stipulation to lift stay and allow discovery on January 27, 2025 (Dkt.
 30 No. 61), which the Court granted on February 6, 2025 (Dkt. No. 62). Thereafter, the Parties submitted
 31 their first stipulation for extension of discovery on April 8, 2025 (Dkt. No. 64), which the Court granted
 32 on April 9, 2025 (Dkt. No. 65). The parties have completed the following discovery to date:

33 1. Defendants served their initial disclosures on October 30, 2024.

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2. Defendants provided Plaintiff with copies of his medical records on March 19, 2025 (previously withheld per rules governing contents allowed in jail cells).
3. Plaintiff served his initial disclosures on April 8, 2025.
4. Plaintiff served his first set of interrogatories to Defendant Dr. Michael Minev on March 31, 2025.
5. Plaintiff served his first set of interrogatories to Defendant Gregory Bryan on March 31, 2025.
6. Plaintiff served his first set of interrogatories to Defendant Dawn Jones on March 31, 2025.
7. Plaintiff served his first set of interrogatories to Defendant Brittany Caldwell on March 31, 2025.
8. Plaintiff served his first set of requests for production to Defendant Dr. Michael Minev on March 31, 2025.
9. Plaintiff served his first set of requests for production to Defendant Gregory Bryan on March 31, 2025.
10. Plaintiff served his first set of requests for production to Defendant Dawn Jones on March 31, 2025.
11. Plaintiff served his first set of requests for production to Defendant Brittany Caldwell on March 31, 2025.
12. Defendants served their first supplemental disclosures on June 12, 2025.
13. Defendant Dr. Michael Minev served his response to Plaintiff's first set of requests for production on June 12, 2025.
14. Defendant Gregory Bryan served his response to Plaintiff's first set of requests for production on June 12, 2025.
15. Defendant Dawn Jones served her response to Plaintiff's first set of requests for production on June 12, 2025.
16. Defendant Brittany Caldwell served her response to Plaintiff's first set of requests for production on June 12, 2025.

1 17. Defendant Dr. Michael Minev served his response to Plaintiff's first set of
2 interrogatories on June 17, 2025.

3 18. Defendant Gregory Bryan served his response to Plaintiff's first set of interrogatories
4 on June 17, 2025.

5 19. Defendant Dawn Jones served her response to Plaintiff's first set of interrogatories on
6 June 17, 2025.

7 20. Defendant Brittany Caldwell served her response to Plaintiff's first set of interrogatories
8 on June 17, 2025.

9 21. Defendants' counsel worked with his clients and others to prepare a spreadsheet
10 identifying the authors and general nature of treatment set forth in numerous illegible
11 medical records for treatment that Plaintiff received by Defendants and other medical
12 providers while incarcerated, which spreadsheet was provided to Plaintiff's counsel on
13 July 22, 2025.

14 22. On July 28, 2025, Plaintiff requested that Defendants assist in transcribing the content
15 of 16 separate, illegible medical records relating to treatment that Plaintiff received by
16 Defendants and other medical providers while incarcerated, which request Defendants'
17 counsel has graciously agreed to accommodate and which will allow Plaintiff to
18 determine which, if any, of the Defendants and/or other witnesses to depose.

19 23. Defendant Dr. Michael Minev served his amended response to Plaintiff's first set of
20 requests for production on July 30, 2025.

21 24. Defendant Gregory Bryan served his amended response to Plaintiff's first set of requests
22 for production on July 30, 2025.

23 25. Defendant Dawn Jones served her amended response to Plaintiff's first set of requests
24 for production on July 30, 2025.

25 26. Defendant Brittany Caldwell served her amended response to Plaintiff's first set of
26 requests for production on July 30, 2025.

REMAINING DISCOVERY

28 The following discovery remains to be completed:

1 1. Depositions of the Parties.
 2 2. Expert witness disclosures.
 3 3. Depositions of expert witnesses.
 4 4. One or more potential independent medical evaluations of the Plaintiff.
 5 5. Third-party subpoenas and depositions, including the FRCP 30(b)(6) representative of
 6 the Nevada Department of Corrections.

7 **GOOD CAUSE TO EXTEND DISCOVERY AND OTHER DEADLINES**

8 Plaintiff and Defendants respectfully submit that good cause exists to continue the discovery
 9 and other deadlines in this matter. Specifically, many (139 of 202 pages) of the medical records relating
 10 to Plaintiff's medical treatment provided by Defendants and others affiliated with the Nevada
 11 Department of Corrections are difficult to read, making an identification of the Plaintiff's treatment
 12 and medical providers impossible to ascertain. The Parties have been cooperatively working towards a
 13 solution, but need additional time to identify the specific content of the medical records, to locate four
 14 (4) sets of imaging, and to determine whether additional medical records are missing or were never
 15 prepared because the medical visits did not occur. Such information and materials are necessary for (i)
 16 determining whether the appropriate parties have been named in this case, (ii) to assess potential third
 17 party depositions and discovery, and (iii) for the Parties' expert witnesses to review in connection with
 18 rendering their opinions regarding the medical treatment provided to the Plaintiff.

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PROPOSED SCHEDULE

October 24, 2025	Initial expert disclosures
November 24, 2025	Rebuttal expert disclosures
December 24, 2025	Close of discovery
February 23, 2026	Proposed deadline for judicial settlement conference to occur
March 9, 2026 or 14 days following settlement conference (whichever is sooner)	Deadline for parties to submit joint status report

9 This stipulation is made in good faith and not for purposes of delay.

10 **IT IS SO STIPULATED.**

11 DATED this 1st day of August, 2025.

12 **NEVADA ATTORNEY GENERAL**

13 */s/ Nathan M. Claus*

14 Nathan M. Claus, Esq.
15 Nevada Bar No. 15889
16 Deputy Attorney General
17 McCarren Center - State of Nevada Campus
18 1 State of Nevada Way, Suite 100
19 Las Vegas, Nevada 89119
20 Counsel for Defendants

5 DATED this 1st day of August, 2025.

6 **GREENBERG TRAURIG, LLP**

7 */s/ Eric W. Swanis*

8 Eric W. Swanis, Esq.
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14 Counsel for Plaintiff

15 **IT IS SO ORDERED.**



16 UNITED STATES MAGISTRATE JUDGE

17 DATED: 8/4/2025

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 1st day of August 2025, a true and correct copy of the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND PRETRIAL DEADLINES** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Chris Darling
An employee of Greenberg Traurig, LLP

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